

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**
MDL No. 3076
Case No. 1:23-md-03076-KMM

IN RE:

**FTX Cryptocurrency Exchange Collapse
Litigation**

THIS DOCUMENT RELATES TO:

The Multinational VC Defendants

O'Keefe v. Sequoia Capital Operations, LLC,
No. 1:23-cv-20700 (S.D. Fla.)

O'Keefe v. Temasek Holdings (Private) Limited,
No. 1:23-cv-23065 (S.D. Fla.)

Chernyavsky v. Temasek Holdings (Private) Limited,
No. 1:23-cv-22960 (S.D. Fla.)

Cabo v. Temasek Holdings (Private) Limited,
No. 1:23-cv-23212 (S.D. Fla.)

**DECLARATION OF ERIC D. LAWSON IN SUPPORT OF THE MULTINATIONAL
VC DEFENDANTS' MOTION TO DISMISS THE [CORRECTED]
ADMINISTRATIVE CLASS ACTION COMPLAINT**

I, Eric D. Lawson, declare as follows:

1. I am Of Counsel with the law firm of Morrison & Foerster LLP. I am duly licensed to practice in the courts of the Commonwealth of Massachusetts and the state of New York. This declaration is based on my personal knowledge, unless otherwise stated, and if called as a witness I could and would testify competently to the facts stated herein.

2. Attached as **Exhibit 1** is a true and correct copy of an article titled “FTX Statement and FAQs,” dated November 17, 2022, available at <https://www.temasek.com.sg/en/news-and-resources/news-room/statements/2022/statement-FTX>.

3. Attached as **Exhibit 2** is a true and correct copy of the Declaration of John J. Ray III in Support of Chapter 11 Petitions and First Day Pleadings, filed on November 17, 2022 in *In re FTX Trading Ltd., et al.*, No. 1:22-bk-11068 (Bank. D. Del.).

4. Attached as **Exhibit 3** is a true and correct copy of the complaint filed on December 13, 2022 in *Securities and Exchange Commission v. Samuel Bankman-Fried*, No. 1:22-cv-10501 (S.D.N.Y.).

5. Attached as **Exhibit 4** is a true and correct copy of the complaint filed on December 21, 2022 in *Securities and Exchange Commission v. Caroline Ellison and Zixiao “Gary” Wang*, No. 1:22-cv-10794 (S.D.N.Y.).

6. Attached as **Exhibit 5** is a true and correct copy of the superseding indictment filed on February 23, 2023 in *United States v. Samuel Bankman-Fried*, No. 1:22-cr-00673 (S.D.N.Y.).

7. Attached as **Exhibit 6** is a true and correct copy of a letter from Brian C. Conklin to Christopher J. Kirkpatrick regarding “Release Number 8499-22 CFTC Seeks Public Comment on FTX Request for Amended Derivatives Clearing Organization (DCO) Registration Order,” dated May 2, 2022.

8. Attached as **Exhibit 7** is a true and correct copy of the Notice of Filing First Interim Report of John J. Ray III to the Independent Directors on Control Failures at the FTX Exchanges, filed on April 9, 2023 in *In re FTX Trading Ltd., et al.*, No. 1:22-bk-11068 (Bank. D. Del.).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of September, 2023 in New York, New York.

/s/ Eric D. Lawson

Eric D. Lawson